

1 James M. Finberg (SBN 114850)  
2 Eve H. Cervantez (SBN 164709)  
3 Danielle E. Leonard (SBN 218201)  
4 Claire Prestel (SBN 235649)  
5 ALTSHULER BERZON LLP  
6 177 Post Street, Suite 300  
7 San Francisco, CA 94108  
8 Telephone: (415) 421-7151  
9 Facsimile: (415) 362-8064

10 Todd M. Schneider (SBN 158253)  
11 Guy B. Wallace (SBN 176151)  
12 SCHNEIDER & WALLACE  
13 180 Montgomery Street, Suite 2000  
14 San Francisco, CA 94104  
15 Telephone: (415) 421-7100  
16 Facsimile: (415) 421-7105

17 Kelly M. Dermody (SBN 171716)  
18 Daniel E. Barenbaum (SBN 209261)  
19 Chimène I. Keitner (SBN 226948)  
20 LIEFF, CABRASER, HEIMANN &  
21 BERNSTEIN, LLP  
22 275 Battery Street, 30th Floor  
23 San Francisco, CA 94111-3339  
24 Telephone: (415) 956-1000  
25 Facsimile: (415) 956-1008

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17 *Additional class counsel appear  
on signature page.*

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20 UNITED STATES DISTRICT COURT  
21  
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 DERRICK SATCHELL, KALINI BOYKIN, ) Case Nos. C03-02659 SI; C03-02878 SI  
24 VALERIE BROWN, RICK GONZALES, )  
25 CYNTHIA GUERRERO, RACHEL )  
26 HUTCHINS, TYRONE MERRITT, KELVIN )  
27 SMITH, SR., and KEN STEVENSON, on behalf )  
of themselves and all others similarly situated, )  
Plaintiffs, )  
v. )  
FEDEX EXPRESS, a Delaware Corporation, )  
Defendant. )  
\_\_\_\_\_  
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CLASS ACTION

STIPULATION AND [PROPOSED]  
ORDER ALLOWING PLAINTIFFS'  
REPLY IN SUPPORT OF MOTION FOR  
AN ORDER FINDING SNYDER  
DEPOSITION TESTIMONY TO BE  
ADMISSIBLE, AND THE SUPPORTING  
PRESTEL DECLARATION, TO BE FILED  
UNDER SEAL

1           WHEREAS on November 21, 2005 the Court ordered that any portion of the depositions  
2 of Michael John Snyder taken in *Pettaway-Vint v. Federal Express Corp.* or *Simonian v. Federal*  
3 *Express Corp.* that are filed with the Court should be filed under seal;

4           WHEREAS on August 30, 2006 the Court ordered that the deposition of Mr. Snyder  
5 taken in this case should also be filed under seal;

6           WHEREAS the reply brief submitted for filing by plaintiffs on January 10, 2007 (titled  
7 Plaintiffs' Reply in Support of Motion for an Order Filing Snyder Deposition Testimony to Be  
8 Admissible) discusses and quotes from the Snyder depositions that the Court has ordered should  
9 only be filed under seal;

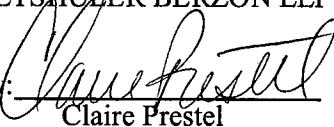
10          WHEREAS the supporting Declaration of Claire Prestel submitted for filing on January  
11 10, 2007 attaches excerpts from Mr. Snyder's *Simonian* deposition as an exhibit;

12          THEREFORE, the Parties, by and through their counsel, stipulate and request that  
13 plaintiffs' reply brief and the supporting Prestel Declaration submitted January 10, 2007 may be  
14 filed under seal pursuant to Local Rule 79-5 and this Court's November 21, 2005 and August 30,  
15 2006 orders.

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17          Dated: January 12, 2007

ALTSHULER BERZON LLP

18          By: 

19           Claire Prestel

20

James M. Finberg (SBN 114850)  
Eve H. Cervantez (SBN 164709)  
Danielle E. Leonard (SBN 218201)  
Claire Prestel (SBN 235649)  
177 Post Street, Suite 300  
San Francisco, CA 94108  
Telephone: (415) 421-7151  
Facsimile: (415) 362-8064

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Todd M. Schneider (SBN 158253)  
Guy B. Wallace (SBN 176151)  
SCHNEIDER & WALLACE  
180 Montgomery Street, Suite 2000  
San Francisco, CA 94104  
Telephone: (415) 421-7100  
Facsimile: (415) 421-7105

1 Kelly M. Dermody (SBN 171716)  
2 Daniel E. Barenbaum (SBN 209261)  
3 Chimène I. Keitner (SBN 226948)  
4 LIEFF, CABRASER, HEIMANN  
5 & BERNSTEIN, LLP  
275 Battery Street, 30th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008

6 MICHAEL S. DAVIS (SBN 160045)  
7 345 Hill Street  
8 San Francisco, CA 94109  
Telephone: (415) 282-4315  
Facsimile: (415) 358-5576

9 JOHN BURRIS (SBN 69888)  
10 7677 Oakport Bldg., Suite 1120  
11 Oakland, CA 94612  
Telephone: (510) 839-5210  
Facsimile: (510) 839-3882

12 WAUKEEN Q. MCCOY (SBN 168228)  
13 703 Market Street, Suite 1407  
14 San Francisco, CA 94103  
Telephone: (415) 675-7705  
Facsimile: (415) 675-2530

15 KAY MCKENZIE PARKER (SBN 143140)  
16 703 Market Street, Suite 1401  
17 San Francisco, CA 94103  
Telephone: (415) 227-9622  
Facsimile: (415) 227-4522

18 *Class Counsel*

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20  
21  
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25  
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1 DATED: January 12, 2007

SEYFARTH & SHAW LLP

2  
3  
4  
*Gil Diekmann Jr.*  
5 Gilmore F. Diekmann Jr.

6 560 Mission Street, Suite 3100  
7 San Francisco, CA 94105  
8 Telephone: (415) 397-2823  
9 Facsimile: (415) 397-8549

10 FEDERAL EXPRESS CORP.  
11 3620 Hacks Cross Road, Bldg. B, 3d Fl.  
12 Memphis, TN 38125-8800  
13 Telephone: (901) 434-8519  
14 Facsimile: (901) 434-9271

15 Evelyn Becker  
16 O'MELVENY & MYERS LLP  
17 1625 Eye Street, N.W.  
18 Washington, D.C. 20006-4001  
19 Telephone: (202) 383-5300  
20 Facsimile: (202) 383-5414

21 *Counsel for Defendant*

